



**Federal Communications Commission  
Washington, D.C. 20554**

September 26, 2018

**DA 18-990**

*Via Electronic Mail*

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and Inmate Calling Solutions, LLC

***Re: Consolidated Application for Consent to the Transfer of Control of Inmate Calling Solutions, LLC to Securus Technologies Inc. (WC Docket No. 18-193)***

Dear Counsel:

By this letter, the Wireline Competition Bureau (Bureau) hereby informs you that as of September 25, 2018, the Bureau is pausing the Commission's informal 180-day shot clock associated with our review of the joint application seeking Commission approval to transfer control of Inmate Calling Solutions, LLC d/b/a ICSolutions (ICS) from TKC Holdings, Inc. (TKC) to Securus Technologies, Inc. (Securus) (together, Applicants).

The 180-day clock represents a good-faith undertaking by the Commission to complete action on assignment and transfer of control applications within a certain timeframe and is a means to keep interested parties informed of the progress of those applications.<sup>1</sup> The clock carries with it no procedural or substantive rights or obligations, but merely represents an informal benchmark by which to evaluate the Commission's progress. Although the Commission seeks to meet the 180-day benchmark, its statutory obligation to determine whether an assignment or transfer serves the public interest takes precedence over the informal timeline.<sup>2</sup> Thus, the Commission retains the discretion to determine whether, in a particular review proceeding, events beyond the Commission's control, the need to obtain additional information, or the interests of sound analysis constitute sufficient grounds to stop the clock.<sup>3</sup>

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<sup>1</sup> 47 CFR § 63.03(c)(2). The shot clock in this proceeding began on July 3, 2018. See *Application Filed for the Transfer of Control of Inmate Calling Solutions, LLC d/b/a ICSolutions to Securus Technologies, Inc.*, WC Docket No. 18-193, Public Notice, DA 18-684 (WCB, IB July 2, 2018).

<sup>2</sup> See 47 U.S.C. §§ 214(a).

<sup>3</sup> 47 CFR § 63.03(c)(1).

While the Bureau appreciates the Applicants' efforts to respond to the Bureau's Information and Document Requests by the deadline of September 25, 2018,<sup>4</sup> Applicants have not yet satisfied those requests for information, documents, and data. The clock will remain stopped until the Applicants have provided us with a full response to our requests, and Commission staff has had a reasonable time to review the documents to ensure that Applicants have provided a complete response.

If you have any questions regarding this matter, please contact Jodie May at (202) 418-0913 or Michael Ray at (202) 418-0357.

Sincerely,

A handwritten signature in black ink, appearing to read "Kris A Monteith". The signature is fluid and cursive, with the first name "Kris" and last name "Monteith" clearly distinguishable.

Kris Anne Monteith  
Chief  
Wireline Competition Bureau

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<sup>4</sup> See Letter from Lisa Hone, Deputy Chief, WCB, FCC, to Paul C. Besozzi and Peter M. Bean, Counsel to Securus, and Howard M. Liberman and Jennifer L. Kostyu, Counsel to ICS and TKC, WC Docket No. 18-193, DA 18-939 (Sept. 11, 2018).